

# EXHIBIT 75

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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

ORACLE USA, Inc., a Colorado corporation;  
 ORACLE AMERICA, INC., a Delaware  
 corporation; and ORACLE INTERNATIONAL  
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
 and SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**ORACLE INTERNATIONAL  
 CORPORATION'S SECOND SET OF  
 REQUESTS FOR ADMISSIONS TO  
 RIMINI STREET, INC.**

PROPOUNDING PARTY: Plaintiff Oracle International Corp.

RESPONDING PARTY: Defendant Rimini Street, Inc.

SET NO.: Two

Pursuant to Federal Rules of Civil Procedure 26 and 36, Plaintiff Oracle International Corp. (“Oracle”) hereby requests that Defendant Rimini Street, Inc., answer the following requests for admission.

# **I. DEFINITIONS AND INSTRUCTIONS**

1. The term “Complete or Partial Copy” shall refer to a copy of all or a portion of Oracle Enterprise Software containing a substantial portion of the protected expression for a corresponding copyright registration alleged by Oracle in its Second Amended Complaint, Dkt. 146.

2. The term “Environment” shall refer to a Complete or Partial Copy of Oracle Enterprise Software created by installing that software from Installation Media or by copying an existing Environment.

3. The term “Oracle Database Software” shall refer to Oracle’s Oracle-branded database Software and Support Materials.

4. The term “Oracle Enterprise Software” shall refer to Oracle’s J.D. Edwards-branded, PeopleSoft-branded, and Siebel-branded enterprise Software and Support Materials.

5. The term “Registered Works” shall refer to Oracle’s registered, copyrighted works listed in Oracle’s Second Amended Complaint, filed June 1, 2011, Dkt. 146, ¶ 75.

6. The term “Software and Support Materials” shall refer to software applications and Environments, program updates, software updates, bug fixes, patches, custom solutions, and/or instructional and knowledge base documents for any families of software products provided by Oracle, including but not limited to Oracle Enterprise Software and Oracle Database Software.

7. The phrase “more than a de minimis or trivial amount of protectable expression” shall refer to the relevant discussion in *Newton v. Diamond*, 388 F.3d 1189, 1192-93 (9th Cir. 2003).

8. The use of a verb in any tense shall be construed as the use of that verb in all other tenses.

**II. REQUESTS FOR ADMISSION**

**REQUEST NO. 19:**

Admit that each Environment identified in Your Responses to Interrogatories No. 20 and 21 (save for those for which the stated version information in Your Response is “No Siebel”) embodies more than a *de minimis* or trivial amount of protectable expression from at least one of the Registered Works.

**REQUEST NO. 20:**

Admit that each Environment identified in Your Responses to Interrogatories No. 20 and 21 as containing PeopleSoft-branded Oracle Enterprise Software contains at least 100 COBOL, SQR, SQC, or DAT files.

**REQUEST NO. 21:**

Admit that each Environment identified in Your Responses to Interrogatories No. 20 and 21 as containing PeopleSoft-branded Oracle Enterprise Software contains at least 10 COBOL, SQR, SQC, or DAT files, each of which embodies more than a *de minimis* or trivial amount of protectable expression from at least one of the Registered Works.

**REQUEST NO. 32:**

Admit that each Environment identified in Your Responses to Interrogatories No. 20 and 21 as containing PeopleSoft-branded Oracle Enterprise Software contains a database that embodies more than a *de minimis* or trivial amount of protectable expression from at least one of the Registered Works.

**REQUEST NO. 43:**

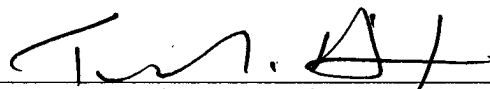
Admit that each Environment identified in Your Responses to Interrogatories No. 20 and 21 as containing J.D. Edwards-branded Oracle Enterprise Software contains at least 100 .c or .h files.

**REQUEST NO. 24:**

Admit that each Environment identified in Your Responses to Interrogatories No. 20 and 21 as containing J.D. Edwards-branded Oracle Enterprise Software contains at least 10 .c or .h files, each of which embodies more than a *de minimis* or trivial amount of protectable expression from at least one of the Registered Works.

DATED: October 3, 2011

Bingham McCutchen LLP

By:   
Thomas S. Hixson  
Attorneys for Plaintiffs  
Oracle USA, Inc., Oracle America, Inc., and  
Oracle International Corporation

**CERTIFICATE OF SERVICE**

At the time of service I was over 18 years of age and **not a party to this action**. My business address is Three Embarcadero Center, San Francisco, CA 94111.

On October 3, 2011, I served the foregoing document:

**ORACLE INTERNATIONAL CORPORATION'S SECOND SET OF  
REQUESTS FOR ADMISSIONS TO RIMINI STREET, INC.**

by causing a true and correct copy of the above to be hand delivered in sealed envelope(s) with all fees fully paid, addressed as follows:

Robert H. Reckers  
Shook, Hardy & Bacon L.L.P.  
600 Travis Street, Suite 1600  
Houston, Texas 77002

I hereby certify that I am employed in the office of a member of the State Bar of California, admitted *pro hac vice* to practice before the United States District Court for the District of Nevada for this case, at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Certificate of Service is true and correct.

Date: October 3, 2011

  
Shirlyn Kim

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PROOF OF SERVICE OF

ORACLE INTERNATIONAL CORPORATION'S SECOND SET OF RFA TO RIMINI STREET, INC.